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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition of the State Independent Alliance	)	
and the Independent Telecommunications	)	
Croup for a Declaratory Ruling That the	)	WT Doc. No. 00-239
Basic Universal Service Offering Provided	)	
by Western Wireless in Kansas is Subject	)	
to Regulation as Local Exchange Service	)	

REPLY TO OPPOSITIONS

Mark E. Caplinger
Janies M. Caplinger
James M. Caplinger, Chartered
823 W. 10th
Topeka, KS 66612

Counsel for State Independent Alliance

Thomas E. Gleason. Jr.
Gleason & Doty. Chartered
P.O. Box 6
Lawrence, KS 66044

Counsel for Independent Telecommunications Group

Stephen G. Kraskin
David Cosson
John B. Adams
Kraskin, Lesse & Cosson, LLP
2120 L St., N.W. Suite 520
Washington, D.C. 20037

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SUMMARY

The oppositions to the Petition for Reconsideration of the Commission's Memorandum Opinion and Order fail to support the erroneous conclusion in the Order that "mobile" services include services that although capable of moving. do not "ordinarily" move within the plain meaning, or even a reasonable construction. of the statute. The Order's conclusion, which *is* not supported by a majority of the Commissioners participating, has neither **a** factual basis in the record for a finding that the custonicr station "ordinarily" moves, nor a legal basis for concluding that occasional use is ordinary use.

The oppositions also fails to establish any legal basis for the Order's conclusion that Commission rules permitting "incidental" use of frequencies assigned to mobile uses are sufficient to preempt state regulation of the *fixed* services pursuant to provisions in the Communications **Act** preempting state regulation of *mobile* services. Congress said only that certain regulations of mobile services were preempted; it did not say "and so are any fixed services that use the same frequencies." It is beyond the Commission's authority to expand a legislative preemption, and the Order makes no finding of any other grounds.

Finally, even if, *arguendo*, the scrvicc is inobile, the Commission should clarify its rationale for the implicit conclusion that the conditions for participation in a voluntary state universal service support mechanism constitute a "requirement" which states are prohibited by the Communications Act from enforcing. Neither the Order, nor the precedents relied on explain why these two terms arc found to bc legally equivalent, and the opponents provide no analysis to

contradict the conclusion of the Utah Supreme Court that the terms are not equivalent. Where the Act contemplates distinct state universal service programs and the Fifth Circuit has determined that additional state requirements are permitted, clarification is needed as to when a state program that is in any way different from the federal program's list of supported services is "inconsistent" with. or burdens the federal program. The comments of the Nebraska Public Service Commission demonstrate a serious need Cor timely guidance in this regard.

Before the
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In the Matter of		
Petition of the State Independent Alliance and the Independent Telecommunications Group for a Declaratory Ruling That the Basic Universal Service Offering Provided by Western Wireless in Kansas is Subject to Regulation as Local Exchange Service	)	WT Doc. No. 00-239

REPLY TO OPPOSITIONS

The State lndependenr Alliancc and the Independent Telecommunications Group ("Independents") hereby file their Reply to the Oppositions and Comments filed October 16, 2002 in response to the Independents' Petition for Reconsideration and Clarification ("Petition") ofthe Commission's Memorandum Opinion and Order ("Order") adopted August 2. 2002 (FCC 02-164) in this proceeding. Oppositions were tiled by Western Wireless Corporation ("Western Wireless") and AT&T Wireless Services, Inc. ("AT&TW") Comments were filed by Cellular Telecommunications and Internet Association ("CTIA"), Fred Williamson and Associates, Inc. ("FW&A"), National Telecommunications Cooperative Association ("NTCA"), Nebraska Public Service Commission ("NPSC") and Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO").

I THE OPPOSITIONS FAIL TO SUPPORT THE ORDER'S ERRONEOUS CONCLUSION THAT BUS IS A MOBILE SERVICE

A. The Requirement That a Mobile Station "Ordinarily" Move Is Not Met by Showings of Capability to Move or Occasional Movement.

The Independents' Petition challenged the Order's conclusion that the "ordinarily does move" definition of mobile service in the statute is met by Western Wireless' BUS even though it does not "usually or typically" move.[1] In its Opposition, Western Wireless argues that the Order's definition of "ordinarily" is a permissible construction of an ambiguous term, and that the ordinary movement is shown by the capability of its equipment, its instruction to customers in that capability, and the indication of at least some "roaming" use as demonstrated by billing records.[2] CTIA recites the same facts and argues that the Commission must make its determination based on the "inherent qualities of the service offering that is reasonably likely, not an analysis of customer usage patterns."[3] The remaining comments which address the issue agree with the Independents.[4]

While the Independents have no desire to belabor the record with repetitious argument, they are compelled to reply that unlike the advice given Alice in *Through the Looking Glass*, words in a statute cannot be made to mean whatever is necessary to achieve a predetermined result, but must be given their ordinary meaning in the absence of compelling indications to the contrary.[5] It is beyond the Commission's discretion to interpret the word "ordinarily" as

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1 Petition at 2-8

2 Western Wireless at 3

3 CTIA at 4

4 NICA at 1-4; OPASTCO at 2-4

5 "But 'glory' doesn't mean 'a nice knockdown argument,"' Alice objected. "When *I* use a word." Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to

"sometimes." "once-in-a-while," or "occasionally." Where the statute plainly says that a station is not a mobile station unless it ordinarily moves; capability of movement, or instructions to customers,[6] or even occasional movement are not evidence of ordinary movement.'

The Independents do not and have never disputed that all of the facts recited by opponents, and relied on in the Order, support a finding that the BIJS terminal equipment *can* move, but those facts simply do not support a finding that it "ordinarily" moves. Where Congress adopts a term to which facts must be applied to reach a regulatory conclusion, just because the Commission must apply facts from the real world to the plain meaning of the term does not make the term ambiguous. Congress docs not expect the FCC to live in a make-believe world, but to acknowledge the actual facts of life that are readily apparent to anybody: very few people will use such a large, awkward, conglomeration of equipment (radio transceiver plus antenna plus telephone set and associated wires) weighing more than eight pounds when shirt pocket size instruments weighing a few ounces are readily available,

The assertion that Congress cannot have intended "ordinarily" to be determined upon specific facts. because those facts might change over time is a legal non-sequitur. There is no inherent reason why the regulatory classification of any service cannot change over time as a result of consumer decisions in the market place, and Congress explicitly recognized and

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mean--neither more nor less."

[6] The customer materials in the record demonstrate that the normal, ordinary expected use of the terminal is for fixed service. *See,* Reply Comments of State Independent Alliance and Independent Telecommunications Group, Jan. 8,2001 at 13-14, Exhibits A & B

[7] CTIA's contention that the Commission should not consider actual customer usage at once both contradicts its member, Western Wireless' claim that customer usage records are relevant, and amounts to an assertion that facts are not relevant in deciding a factual question.

authorized such change in Section 332 and elsewhere.[8] If, at an earlier time. the BUS terminal equipment was the only equipment available to consumers which was capable of mobility, it might well have, at that time, "ordinarily" moved. Rut, just as there is today no market for the lunch box sized bag phones with their associated power, antenna and hand set wires because they have been displaced by much more portable and convenient handsets, the statute contemplates that statc regulation of a service that is ordinarily a fixed service is not preempted. This is true even if at a purely hypothetical other time and place the service might have qualified as a mobile service

B. Whether the Order's Conclusion Regarding Mobility Is "By the Commission" Is Relevant to the Ultimate Resolution of this Proceeding.

The Petition pointed out that the conclusion of the Order regarding mobility was not supportcd by two of the four Commissioners and requested either deletion of that conclusion or clarification that the "by the Commission" designation is not applicable to this portion of the Order.[9] Western Wireless asserts that the issue is irrelevant and without legal significance, and that in any event a majority did agree that "BUS equipment satisfies the 'ordinarily does move' definition."[10] The assertion that the statement of Commissioner Abernathy that "consumers will not ordinarily use the [equipment] in a mobile fashion" can he read as an agreement that the equipment "ordinarily does move" is certainly worth of Lewis Carroll, or perhaps George Orwell,

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[8] 47 U.S.C. 332(c)(3) (state may bc authorized to regulate rates upon petition demonstrating certain market conditions); 47 U.S.C. 251(f)(1)(B) (state may terminate exemption of rural telephone company from certain requirements).

[9] Petition at 2

[10] Western Wireless at 10.

but has no connection with real life. **A** majority did not support the conclusion. AT&TW correctly points out the legal significance of this issue, i.e., paragraph 15 of the Order states that RLJS is classified as CMRS for two *independently* sufficient reasons, and Commissioner Abernalhy clearly endorsed the second reason, giving that reason a majority vote." There is, however. no majority for the first reason.

Reconsideration or clarification of this point does not endanger "the importance and significance of concurring opinions as claimed by Western Wireless. To the contrary, recognition of the contents of such opinions strengthens their significance as a record of the reasons for Commission action, as an aid to readers of the decisions and for judicial review. If the actual statements in a concurrence are to be ignored, then they should be eliminated and the paper saved. It is true as Western Wireless claims that the Petition provides no legal support for the unremarkable proposition that a decision "by the Commission" necessarily implies that a majority of a quorum of the Commission agreed with both of the independently sufficient reasons. In turn, however, Western Wireless provides no legal support for the extraordinary contrary position.

II FCC CLASSIFICATION OF A FIXED SERVICE AS INCIDENTAL TO A MOBILE SERVICE IS NOT GROUNDS FOR STATUTORY PREEMPTION OF STATE REGULATION OF FIXED SERVICE

The Independents' Petition wondered how a service which is required to be offered and advertised to all potential subscribers throughout the designated service can be "incidental" to another service offered in the same area. Assuming, *agruendo*, that such a service can be within

[11] AT&TW at 8

the original intent of "incidental," the Petition argued that while the FCC has adequate authority under the statute to permit such incidental services to operate on frequencies otherwise assigned to mobile use, the statutory preemption of state regulation in Sections 332(c)(3) and 332(c)(8) refers only to *mobile* services. PCC decisions permitting fixed operation on frequencies assigned to niobile do not make the fixed operation niobile. Therefore, there is no basis for the Commission to declare state regulation preempted."

Western Wireless and AT&TW oppose the Petition on this point, but never come to grips with the Independents' point that the Commission lacks authority to enlarge by rule the categories of service which Congress preempted from statc regulation. The opponents do not explain the leap in logic from a decision permitting fixed use of mobile frequencies to a conclusion that such fixed service is legally mobile for the purpose of preemption of state regulation

Western Wireless argues that Congress passed up several opportunities to reject the Commission's decisions treating incidental services as mobile and thereby acceded to the Commission's interpretation. Whether Congress acceded to a rule that allows fixed stations on mobile frequencies is not even a very meaningful inquiry because Congress did not specify which services could use which frequencies, and is irrelevant to the question of whether fixed stations are considered mobile for preemption purposes in any event. The opponents present no evidence that Congress was aware that the FCC believed that states were preempted from regulating fixed services which operate on mobile frequencies. Until the Order was adopted, the FCC itself had

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[12] Petition at 8 - 11. Note that the Order's conclusion to the contrary assumed that the BUS was a fixed service.

not taken a position on this issue so there no basis for a Congressional accession argument because Congress did not know the Commission's position. Finally, even where applicable, Congressional accession is, at best, a make weight argument which rarely justifies a conclusion contrary to the statute.

Western Wireless also argues that because BUS subscribers are, at present, a small percentage of its basic cellular subscriber base: it would not he practical or justifiable to put the BUS customers in a different regulatory classification. First of all, it was Western Wireless which choose to create a different category of subscribers and which elected to request Eligible Telecommunications Carrier ("ETC") designation from the Kansas Commission. It was Westcrn Wireless' choice to agree to provide the supported services throughout the designated area, to advertise the availability of the services. and to execute the certifications as to the use of any USF support received. none of which requirements apply to its cellular mobile offerings. If it is not practical to apply the ETC requirements to a small percentage of the customers, Western Wireless never should have applied for ETC status. In addition, the question is whether state commission regulations are preempted by statute. not whether they are practical or justified. The Commission only has authority to declare preempted those state regulations pertaining to intrastate service which violate the statute or contlict with the Commission's regulation of interstate services. If a state regulation is impractical or unjustified, the remedies lie in the state.

III CLARIFICATION OF THE RIGHT OF STATE COMMISSIONS TO PROVIDE SUPPORT FOR SERVICES IN ADDITION TO THE FEDERAL LIST WOULD BE BENEFICIAL TO ALL SIDES

The Independents' Petition asked the Commission to clarify whether its conclusion that a state could not require a CMRS provider to offer equal access was equivalent to a conclusion that

a state could not establish a state support mechanism for carriers offering equal access. In this regard. the Petition raised the question of whether a "condition" of participation in a voluntary state program is nevertheless the legal equivalent of the statutory term "requirement" for purposes of Section 332(c). The Petition also sought clarification of the Commission view of the practical aspects of the encouragement in the Communications Act to states to not only preserve, but advance universal service."

AT&TW. CTIA and Western Wireless oppose the request for clarification. AT&T asserts states are prohibited from establishing an equal access requirement for eligibility for state USF by section 332(c)(8) of the Communications Act and asserts that most CMRS providers rate plans are such that they would not seek ETC status which would "deprive customers of a service option." Further AT&TW argues that under Section 254(f) state universal service rules cannot be contrary to FCC rules or burden federal mechanisms. Finally, AT&TW argues that the fact that wireline carriers are required to provide equal access and wireless carriers are not does not violate competitive neutrality because the requirement arose in a different context.[14] Western Wireless agrees and asserts that the Commission has already determined that to condition receipt of support on provision of equal access is the equivalent of imposing a requirement.[15]

The Petition pointed out, and the opponents do not directly address, that the prohibition on state imposition ofcertain requirements on CMRS providers in section 332 is not obviously violated when the requirement can be easily avoided by simply choosing not to participate in a

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[13] Petition at 11-13

[14] AT&TW at 3-7

[15] Western Wireless at 14-18

voluntary program. Since Section 332(c) was enacted prior to Section 254, it cannot be said that Congress meant to include voluntary participation in state support mechanisms within its preemption of state regulation. Western Wireless dismisses the Utah Supreme Court's conclusion that a such a condition is not a requirement within the meaning of section 332(c) as "patently inconsistent" with Commission precedent." As a party to that case, and one which did not seck federal preemption, Western Wireless is probably barred by estoppel from contesting its result.

At least the Utah Supreme Court understood and analyzed the issue. The Commission's sole discussion is the statement in the Universal Service Order that including equal access in the list ofsupported scrvices would require CMRS providers *to* provide the service in order to receive USF and that "such an outcome would be contrary to the mandate of section 332(c)(8)."[17] Of course including equal access in the list ofsupported services would require it to be provided in order to receive support. So much is obvious from the definition, but it does not follow that such inclusion constitutes a prohibited "requirement" if participation in the program is voluntary. At a minium the Commission is required to explain the logic of its decision where the rationale is not self-evident, and a state supreme court has explained its reasons for a contrary conclusion.

The comments ofthe Nebraska Public Service Commission ("Nebraska PSC") show why it is important that the Commission provide more expansive and reasoned guidance regarding its view ofthe permissible scope of service requirements in state USF programs. The Nebraska PSC

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[16] Western Wircless at 16. n.40

[17] Federal-State Joint Board on Universal Service, *First Report and Order,* 12 FCC Rcd 8776, 8819 (1997).

asserts, relying on the statute, the Firth Circuit decision and the Utah Supreme Court decision, that the regulatory classification of a service is not relevant to whether a state may impose conditions on the receipt of state usf.[18] In neither the Order, nor the Universal Service Order has the Commission laid out a coherent and reasoned explanation of the interactions between the relevant portions of the law.

The Fifth Circuit has made clear that nothing in section 214 limits a state's authority to impose additional conditions. noting "the states' historical role in ensuring service quality standards for local service."[19] As the Nebraska PSC points out, section 254(f) specifically permits states to adopt additional definitions and standards for universal service support, so long as there is no reliance or burden on federal mechanisms. The opponents point to the sentence in section 254(f) as prohibiting inconsistent state universal service regulations but do not resolve the necessarily implication of the statute that "additional" regulations are not *per se* inconsistent.

In clarification of the Order, it is important for the Commission to harmonize these requirements. On the one hand, states have explicit authority to adopt additional conditions, on the other hand such conditions cannot be inconsistent with, rely on or burden federal support mechanisms. It must be the Congressional intent that additional state requirements are not always inconsistent with federal requirements: otherwise the words of the last sentence of section 254(f), as well as the Firth Circuit's decision are meaningless. Thus if the federal list requires provision of service with 10 characteristics. it cannot be inconsistent, *per se*, for a state to have a list of 12 required characteristics. Where the additional conditions in a state list apply only to

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[18] Nebraska PSC at *3*.

[19] *Texas Office of Public Utility Counsel v. FCC*, 183F.3d 393, 418 (5th Cir. 1999).

state support mechanisms, a challenger must show how those conditions rely on. or burden the federal mechanisms.

AT&TW attempts. but fails, to detnonstrate such a burden by claiming that a state equal access requirement would increase federal USF fund size.[20] The more logical view is that of the Nebraska PSC that there is no burden on federal mechanisms because the cost recovery mechanism is limited to the state jurisdiction.[21] The opponents also claim that universal service would he harmed because customers would be deprived of choice, but provide no facts whatsoever to support this conclusion. and it is not obvious why a requirement to provide a choice of long distance carriers deprives customers ofchoice. To the contrary, it is the opponents who would deny customers choice. Equal access does not preclude a Western Wireless subscriber from choosing Western Wireless as its long distance provider, whether or not that service is offered on a bundled basis with local service. The CMRS carriers which already provide service in an area, and which will often receive a windfall in federal USF based on the ILECs costs, have not provided any facts from which the commission could conclude that either they cannot provide equal access, or that in the absence of state support (but with federal) they would withdraw their service offerings.

IV CONCLUSION

The State Independent Alliance and the Independent Telecommunications Group, have shoun that their Petition for Reconsideration is well founded, that neither the facts nor any

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[20] AT&TW at 6

[21] Nebraska PSC at 3

permissible construction of the plain meaning of the statute permit a conclusion that a large, heavy and awkward arrangement of equipment "ordinarily" moves when alternatives are readily available that are orders of magnitude better suited to movement. Nor can the Order be sustained on the basis of rules permitting provision of fixed service on frequencies originally assigned to mobile use. Where the statutory preemption is of statc regulation of mobile service, use of certain frequencies does not make a fixed service mobile, especially when the rule provision permitting use of such frequencies on an "incidental" basis is now obsolete and unnecessary Finally, clarification is requested regarding interpretation of the statutory and judicial sanction of state establishment of separate universal service support programs in the context of establishing a what point a condition in a voluntary program becomes a prohibited requirement.

Respectfully submitted

Stephen G. Kraskin

Mark E. Caplinger
James M.. Caplinger
James M.. Caplinger Chartered
823 W. 10th
Topeka, KS 66612
Counsel for State Independent Alliance

David Cosson
John B Adams
Kraskin, Lesse & Cosson, LLP
2120 L St., N.W., Suite 520
Washington, D.C. 20037
202-296-8890

Thomas E. Gleason, Jr.
Gleason & Doty. Chartered
P.O. Box 6
Lawrence, KS 66044
Counsel for Independent Telecommunications Group

CERTIFICATE OF SERVICE

I, Naoini Adams, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington: DC 20037, do hereby certify that a copy of the foregoing "Reply to Oppositions of the State Independent Alliance and the lndependent Telecommunications Group" was served on this 31st day of October, 2002 by first class, U.S. mail, postage prepaid or by hand delivery to the following parties:

Naoini Adams

Chairman Michael K. Powell *
Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington. DC 20554

Commissioner Michael J. Copps *
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

Commissioner Kathleen Abernathy *
Federal Communications Commission
445 12th Street. SW, Room 8-A204
Washington, DC 20554

Commissioner Kevin Martin *
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

Qualex International *
Portals II
445 12th Street, SW
Room CY-B402
Washington, DC 20554

William Meher, Chief *
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington. DC 20554

Thomas J. Sugrue, Chief *
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street. SW
Washington, DC 20554

Rose Crellin *
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Policy and Rules Branch*
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Gene DeJordy, Vice President, Regulatory Affairs
Western Wireless Corporation
3650-131st Avenue, SE, Suite 400
Bellevue, WA 98006

Jeff S. Wagaman, Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka. KS 66604-2425

Lisa C. Creighton
Sonncnschein, Nath & Rosenthal
4520 Main Street. Suite 1100
Kansas City, MO 64111
Counsel for Western Wireless Corporation

Michele Farquhar
David Sierdzki
Ronnie London
Hogan & Hartson, LLP
555 Thirteenth Street. N W
Washington, DC 20004-1109
Counsel for Western Wireless Corporation

Mark Ayotte
Lisa Agrimonti
Briggs & Morgan, PA
2200 First National Bank Building
332 Minnesota Street
St. Paul, MN 55101
Counsel for Western Wireless Corporation

Douglas Meredith
Diector of Economics and Policy
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook. M D 20706

Elisabeth H. Ross
Birch, Horton, Brittner & Cherot
1155 Connecticut Ave., NW Suite 1200
Washington, DC 20036
Counsel for the Kansas Corporation Coinmission

Eva Powers, Assistant General Counsel
Kansas Corporation Commission
1500 SW Arrowhead
Popcka, KS 66604

L. Marie Guillory
Daniel Mitchell
National Telephone Coop. Assoc.
4121 Wilson Boulevard, 10th Floor
Arlington. VA 22203-1801

Thomas G. Fisher, Jr.
Hogan & Fisher, PLC
3101 Ingersoll Avenue
Des Moines, Iowa 50312
Attorneys for Rural Iowa Independent Telephone Association

Jimmy D. Crosslin
Manager- Regulatory/Legislative Affairs
2921 East 91st Street, Suite 200
Tulsa, OK 74137-3300

Richard J. Johnson
Moss & Barnett
A Professional Association
4800 Wells Fargo Center
90 South 7th Street
Minneapolis, MN 55402-4129

Vincent H. Wiemer
Beacon Telecomunications Advisors, LLC
8801 South Yale, Suite 450
Tulsa, OK 74137

Caressa D. Bennet
Kenneth C. Johnson
Bennet & Bennet, PLLC
1000 Vermont Avenue, 10th Floor
Washington, DC 20005
Counsel for Rural Telecommunications Group

Kellcy R. Dahl
Baird, Holm, McEachen, Pederen, Hamann & Strasheim. LLP
1500 Woodem Tower
Omaha, NE 68102

Jeffrey M. Phaff
Sprint PCS
4900 Main, 11th Floor
Kansas City, MO 64112

William J. Warinner, CPA, Principal
Warriner, Gesinger & Associates. LLC
10901 W. 84th Terrace. Suite 101
Lenexa, KS 66214

Stuart Polikoff, Director of Government Relations
Stephen Pastorkovich, Senior Policy Analyst
OPASTCO
21 Dupont Circle. NW, Suite 700
Washington, DC 20036

Ronald L. Ripley, Corporate Counsel
Dobson Cellular Systems, Inc.
13439 N. Broadway Extension, Site 200
Oklahoma City, OK 73114

Richard D. Coit, Executive Director and General Counsel
320 E. Capitol Avenue
PO Box 57
Pierre, SD 57501

Anne C. Boyle, Chair
Gerald L. Vap, Vice-Chair
Frank E. Landis, Commissioner
Lowell C. Johnson, Commissioner
Rod Johnson, Commissioner
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
PO Box 94927
Lincoln, NE 68509

* via hand delivery